



April 23, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: Lifeline and Link Up Reform and Modernization - WC Docket No. 11-42  
Lifeline and Link Up - WC Docket No. 03-109  
Federal-State Joint Board on Universal Service - CC Docket No. 96-45  
Advancing Broadband Availability Through Digital Literacy Training - WC  
Docket No. 12-23**

Dear Secretary Dortch:

The Association for Rural & Small Libraries (ARSL) respectfully writes in support of the comments submitted in this proceeding by the American Library Association (ALA) to increase the capacity of libraries across the nation to support the digital literacy needs of their communities.

ARSL is a network of persons throughout the country dedicated to the positive growth and development of libraries. ARSL believes in the value of rural and small libraries and strives to create resources and services that address national, state, and local priorities for libraries situated in rural communities. Improving digital literacy is a concern that cuts across all of our members, and we believe providing digital literacy training, whether through formal classes or informal support mechanisms, is a critical service our libraries should offer. We believe savings from the Lifeline program could be effectively leveraged by public libraries to expand our reach to more people and to support new training in libraries that have lacked trainers and other resources to meet the digital literacy needs of their residents.

One of our board members relates a conversation she had with a library director in Texas who wanted to implement a digital literacy training program for seniors, but her connectivity was so poor she couldn't guarantee they would have Internet connectivity for all of the sessions. This scenario is played out in rural settings all across the country.

The comments of ALA articulate the concerns ARSL has in considering how to increase the capacity of local libraries, as well as strategies for implementing the program that we believe will result in a successful, scalable, and sustainable digital literacy program.

In particular, we wish to focus on several points made by ALA that we support and would ask the Commission to consider. ARSL

- is opposed to adding a digital literacy component to the E-rate program. E-rate discounts are a critical resource for our libraries' connectivity and infrastructure needs. We believe and the program should not be altered to include digital literacy;
- is opposed to a match requirement. We believe such a requirement would discourage many rural and small libraries from applying;
- supports funding libraries that currently offer digital literacy training, in addition to those that do not offer training;
- supports a minimum funding level of \$25,000 per entity per year and a two-year application cycle;
- supports a flexible program design that includes state-wide consortium applications to maximize the number of libraries that could benefit from the initiative and minimize the burden on smaller libraries. We also believe consortium applications would likely support the most cost-effective implementation of the program; and
- suggests that the Commission build on the experience of the National Telecommunications and Information Administration (NTIA) and the Institute of Museum and Library Services (IMLS) in developing the digital literacy program.

ARSL thanks the Commission for its acknowledgement of the important role U.S. public libraries already play in supporting and advancing digital literacy. Our member libraries stand ready to help the Commission achieve its goal of increasing opportunities for the public to improve their digital literacy skills so that the benefits of broadband can truly be realized.

Respectfully submitted,

Rebecca Heil, President  
Sonja Plummer Morgan, Past President  
Association for Rural & Small Libraries